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10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
12 **WESTERN DIVISION**
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14 ELECTRIC SOLIDUS, INC. d/b/a
15 SWAN BITCOIN, a Delaware
corporation,,

16 Plaintiff,

17 v.

18 PROTON MANAGEMENT LTD., a
British Virgin Islands corporation;
19 THOMAS PATRICK FURLONG;
ILIOS CORP., a California corporation;
20 MICHAEL ALEXANDER HOLMES;
RAFAEL DIAS MONTELEONE;
21 SANTHIRAN NAIDOO; ENRIQUE
ROMUALDEZ; and LUCAS
22 VASCONCELOS,

23 Defendants.
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Case No. 2:24-cv-8280-MWC-E

**[PROPOSED] ORDER GRANTING
APPLICATION FOR LEAVE TO
FILE UNDER SEAL JOINT
STIPULATION REGARDING
SWAN'S MOTION TO COMPEL
TARGETED DISCOVERY AND
EXHIBITS**

On April 23, 2025, Plaintiff Electric Solidus, Inc. d/b/a Swan Bitcoin (“Swan”), through counsel, submitted an Application for Leave to File Under Seal the Joint Stipulation Regarding Swan’s Motion to Compel Targeted Discovery and Exhibits.

The Court, having considered the Plaintiff’s Application and finding compelling reasons therefor, hereby GRANTS the Application and ORDERS the following documents and/or document portions sealed as follows:

Ex. 1: Joint Stipulation Regarding Swan’s Motion to Compel. Highlighted portions at pages 10, 12, 24-26, 28-30, 33-40, 47, 58, 60-62, 64-85.	REDACTIONS APPLIED TO PUBLIC VERSION
Ex. 2: Ex. I to the Joint Stipulation (Slack Communication)	DOCUMENT FILED ENTIRELY UNDER SEAL
Ex. 3: Ex. J to the Joint Stipulation (Slack Communications)	DOCUMENT FILED ENTIRELY UNDER SEAL
Ex. 4: Ex. K to the Joint Stipulation (Proton Am. RFP Responses)	DOCUMENT FILED ENTIRELY UNDER SEAL
Ex. 5: Ex. L to the Joint Stipulation (Proton Am. ROG Responses)	DOCUMENT FILED ENTIRELY UNDER SEAL
Ex. 6: Ex. M to the Joint Stipulation (Ind. Defs. Am. RFP Responses)	DOCUMENT FILED ENTIRELY UNDER SEAL
Ex. 7: Ex. N to the Joint Stipulation (Ind. Defs. Am. ROG Responses)	DOCUMENT FILED ENTIRELY UNDER SEAL
Ex. 8: Ex. Q to the Joint Stipulation (April 15, 2025 Letter)	DOCUMENT FILED ENTIRELY UNDER SEAL
Ex. 9: Ex. U to the Joint Stipulation (Site Agreement)	DOCUMENT FILED ENTIRELY UNDER SEAL

1 Ex. 10: Ex. V to the Joint Stipulation (Site
2 Agreement)

DOCUMENT FILED
ENTIRELY UNDER SEAL

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4 **IT IS SO ORDERED.**

5 DATED:

6 _____
7 HON. CHARLES F. EICK
8 UNITED STATES MAGISTRATE JUDGE
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